



SUFFOLK CONSTABULARY

NOT PROTECTIVELY MARKED

Police Station, Raingate Street, Bury St Edmunds, Suffolk IP33 2AP

Telephone: 101 or 999 in an emergency Fax: 01284 774130

Calls may be monitored for quality control, security and training purposes.

Jackie Norton
Design Out Crime Officer - West
Direct Dial: 01284 774141
Mobile 07803737748

Date: 3 March 2021

PLANNING APPLICATION: DC/21/0110/RM Land Nw Of Haverhill Anne Sucklings Lane, Little Wrattling, Suffolk.
PROPOSAL: Reserved matters application - submission of details under outline planning permission SE/09/1283 - the means of access, appearance, landscaping, layout and scale for the construction of 127 dwellings, together with associated private amenity space, means of enclosure, car parking, vehicle and access arrangements together with proposed areas of landscaping and areas of open space for a phase of residential development known as phase 2b Location Land Nw Of Haverhill Anne Sucklings Lane Little Wrattling Suffolk.

PLANNING OFFICER: Penny Mills

This crime prevention advice is given without the intention of creating a contract. Neither the Home Office nor Police Service accepts any legal responsibility for the advice given. Fire prevention advice, Fire Safety certificate conditions, Health & Safety Regulations and safe working practices will always take precedence over any crime prevention issue. Recommendations included in this document have been provided specifically for this site and take account of the information available to the Police or supplied by you. Where recommendations have been made for additional security, it is assumed that products are compliant with the appropriate standard and competent installers will carry out the installation as per manufacturer guidelines. Suppliers of suitably accepted products can be obtained by visiting www.securedbydesign.com.

Dear Ms Mills

Thank you for the opportunity to comment on the above planning application.

Suffolk Police ask that the following recommendations included in this letter are considered when making your decision regarding this application.

In its current format Suffolk Police have serious concerns that such a proposal would see crime rise significantly within this area and in order for police to be able to support the application they urge the developers/planners to reconsider their proposals and review the recommendations provided.

SECURE BY DESIGN (SBD)

Building to the physical security of Secured by Design, which is the police approved minimum security standard, will reduce the potential for burglary by 50% to 75% and achieve ADQ.

An early input at the design stage is often the best way forward to promote a partnership approach to reducing the opportunity for crime and the fear of crime. Secured by Design aims to achieve a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development. These features include secure vehicle parking, adequate lighting of common areas, control of access to individual and common areas, defensible space and a landscaping and lighting scheme which when combined, enhances natural surveillance and safety. Experience shows that incorporating security measures during a new build or a refurbishment project reduces crime, fear of crime and disorder.

NPPF

Crime and Disorder NPPF Policies that are applicable to this application are Para 127f and 91b.

Paragraph 91b.

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas.

Paragraph 127(f).

Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁶; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Section 17 of the 'Crime and Disorder Act 1998'

This part of the CDA places a duty on each local authority: 'to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area to include anti-social behaviour, substance misuse and behaviour which adversely affects the environment'.

Further information on SBD can be found at www.securedbydesign.com

PLANNING PORTAL INFORMATION, DAS AND PLANNING STATEMENT

Having reviewed the DAS prepared by Persimmons, (Jan 2021) the points noted that could have an impact on Designing Out Crime principles were:

The local centre should be prominent feature and serve as a local landmark along with any open space areas being designed so that dwellings will orientate towards the area in order to maximise natural surveillance. It is positive that dwellings will orientate towards the area to maximise natural surveillance and in line with SBD and CPTED principles.

Section 4 Key Design Principles and Objectives (pg 9) outlines the site permeability through the provision of walk and cycle ways will be provided and where houses front outwards towards green space and other existing natural features. It was questioned as to what was the purpose of the green open spaces. This would be a concern in relation to Crime Prevention Through Environmental Design (CPTED) guidance as well. Open space areas can often lend themselves to areas of ASB or mis-use of drugs, if not serving a point or monitored adequately. Also, too much permeability can lead to criminal activity and allow potential offenders numerous routes in and out of an area making it a desirable offending location.

Concerns were raised about lanes dominated by cars and for bin areas to be documented at an early stage. Numerous cars parking along the streets or on curbs are an issue for the emergency services as they restrict quick access to those in need. It is also important to note where bins will be stored/collected as bins are often used as climbing aides into rear gardens or for use of ASB and Arson.

There is reference to the allotment area being secured appropriately, with something such as chain-link and planting. Security of the allotment area is essential, as often there are issues with allotment crimes.

Improvements around pedestrian and cycle links were required along the eastern boundary and houses should be facing the pathways for surveillance. Surveillance is key to reducing the opportunity for crime and this is a positive approach.

During consultation the councils Urban Designer suggested incorporating FOGS in the rear parking courts to provide a visual interest as well as surveillance over parking courts.

The whole site will only have one vehicular access point in and out with pedestrian routes north to south and east to west (4 in total). Rear car parking courts are not recommended within CPTED or SBD principles and car ports do not provide security for vehicles or residents living above them.

The DAS also notes (pg 27) Street Types and Materials that boundary types will consist of estate rail fencing, low level brick planters, private frontages, along with hedging boundaries in some places. Low level brick planters are often used as seating or climbing areas which again lead to ASB issues. Planters will need to be maintained regularly for the life time of the estate and ensure that they do not restrict surveillance to areas or allow for sitting on.

Along the Eastern Ridge there will be a 2 m wide pedestrian route, forming from Ann Suckling road in the south and past the allotments. Communal areas and the village green and focal squares will have a good sense of natural surveillance and the focal square with parking area on the southern side will have surveillance to 3 sides. Pedestrian paths are recommended to be 3 m wide to afford a good level of security and protection to all users.

Page 34 states that the rear parking courts will also have landscaping along with the FOGS which will provide interesting and "safe areas for residents to mingle". All communal areas will be maintained by a management company. **There is a serious concern that these areas could become an area for Arson, ASB activity or Mis-use of drugs due to car ports being incorporated into the scheme and the quantity of rear parking courts.**

Parking will be either on plot, allocated parking within Mews Streets, Parking Courts and designated visitor parking spaces. Larger dwellings will have integral garages and these dwellings will have sheds in their gardens to provide cycle storage. Apartments will have communal refuse areas facilities. There is no mention of security of cycles for the apartments or the some of the other dwellings.

Finally, (pg 36) Section 6.13 Security only **has 2 points raised in regards to Security Measures.** Those points referred to the mews courts being naturally overlooked creating a safe footway network and sense of ownership and external planting in new areas close to properties will define the footway from the vehicle access and create a sense of territorial responsibility mentioned in the Haverhill Design Code. CPTED and SBD Principles offer various detailed security guidance's and these should be reviewed and incorporated into the design and build.

General Comments/Crime Statistics

Historically the proposed development was a reasonably low crime area due to encompassing open farm land. The development will be on the periphery of Haverhill and spreading towards Little Wratting. It is part of significant further developments (parcels) within this location and on top of other areas being developed on recently in Haverhill, this area will undoubtedly see a rise in crime rates.

Haverhill suffers with issues around antisocial behaviour, robbery predominately linked to county lines and vehicle crime.

Crime levels within the **newly constructed residential areas close to Phase 2B were checked with those being Beavis Close, Amey Close, Orbell Avenue, Claydon Court, Shipp Close and Webb Close for the past 13 months (1/1/20 to 23/2/21) are 38.**

Those crimes relating to the application are: (figures based on Suffolk Police Crime Computer) **Domestic Violence 13, Theft other 1, Assault 6, Anti-social Behaviour 3, Public Order Act 1, Drugs 2, Harassment 3, Mal Comms 1, Weapons 2, Recall to Prison 1, Other crimes 7.**

I've liaised with Haverhill's Safer Neighbourhood Policing Team in relation to demand on police and other partnership resources in those areas. Currently there is a significant demand on police resources relating to matters around drug activity, mental health issues, ASB and community unrest. Responses involve significant partnership working with the main local housing association "Cotman" around tenancy agreements, proactive support for tenants in those areas, as well as dealing with ASB issues.

It is therefore important that every opportunity is included to "design out crime" in order to not significantly increase crime levels in the new area.

Specific Observations

There are areas of concern that could be addressed in order to reduce the opportunity for crime and to make the development a secure, safe and desirable development for residents to live in. These recommendations will also positively impact on police demand, housing associations and other partnership agencies resources as well as the residents.

Suffolk Police Areas of concern relate to:

- **Parking:** There are a significant number of rear parking areas which cause concern. **Rear parking is not recommended within SBD H 2019 (section 16.3)** due to lack of surveillance and allowing for the opportunity of ASB or easy access to rear gardens where most burglaries occur (access into gardens via refuse bins left out or gates unlocked). The FOG's positioned in these areas may provide a little surveillance into some of the area by residents when they are at home but their design could create other issues documented below. The FOG's only provide surveillance to the front due to insufficient gable end windows.

The access points in and out of the rear parking areas, through the under-croft areas, could create Vehicle ASB with motorbikes, scooters and cycles racing through them and also gives offenders various options of exiting quickly. Currently this design appears to give a big loop of rear courtyards with access in and out. There are a few traffic calming measures in place but these may not impact on cycles and motorbikes/peds/scooters. **Suffolk Police do not recommend this layout design.**

The majority of parking throughout the site assigned is “allocated parking” with very few garages on site. Allocated parking spaces can cause issues with neighbourhood parking disputes or visitors using residents parking due to not knowing which areas are visitors or residents.



RECOMMENDATION: Suffolk Police do not recommend the design of rear parking with FOG (with carports) and strongly advise that parking areas are re-designed.

Either completely remove or reduced in numbers the rear parking. Where they have to be located they should be only one entry/exit point to give more consideration to vehicle security and also reducing the opportunity for ASB gathering.

Dwellings should be designed with more in curtilage parking or garages.

Some of the dwellings can't see their vehicles due to being parked in the insecure car ports (Plot 23 is just one example of this where parking is underneath Plot 16). Surveillance into these areas will be further compromised by the vehicles parked in 21/22/10/11 parking areas. This also applies to areas where parking is in under crofts (Flying freeholds) (Plot 2 is one example) which also appears to have foot paths running along the inside.

This leaves the vehicles vulnerable to car crime or criminal damage. These issues are throughout the site where rear parking and carports or under crofts (flying freeholds) are placed. Visitor parking areas should be clearly defined with marked line marking, as “visitors” parking areas.



- **Gable End Windows:** Gable end windows in active rooms provide natural surveillance to in-curtilage parking as well as surveillance to public areas that abut any residential dwellings. (SBD Homes 2019 Section 12 refers and 16.2).

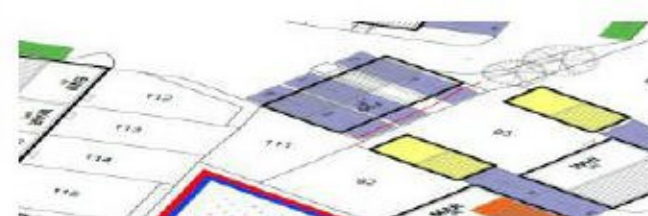
Dwelling types without gable windows or gable windows in active rooms are Belmont, Corby, Grizzdale, Ennerdale, Wareham, Heatwood, Marston, Greenwood, Whinfell, Saunton, Sherwood, Danbury, Epping, Alnmouth, Corby and Arden. This is a high proportion of the dwelling designs submitted.

RECOMMENDATION: A really good example of gable end windows in active rooms (and the only one on site) is Charnwood. There should be an increase of gable end windows in active rooms into all of the designs to increase natural surveillance.

- FOG Dwellings:** The FOG dwellings show as having “car port” areas (FOG v3, v2, and v1.)
RECOMMENDATIONS: These are not recommended as they do not provide secure storage for vehicles or property. They restrict natural surveillance to vehicles parked in them as well as gardens located behind them. The car port areas also have the potential to act as a sheltered gathering area when not being used by vehicles and could contribute to ASB issues, graffiti or arson attempts. It is strongly recommended that they are converted to garages to ensure they are in line with SBD principles and SBD Homes 2019 Section 16 (16.5/16.6/16.8). This will reduce the opportunity for crime such as theft, ASB and Mis-use of Drugs/Arson.
 Fog v2 also has no gable end windows for natural surveillance.



There are also concerns that the FOG areas reduce surveillance to rear gardens. A couple of examples (but not exhaustive) are FOG 109, 110, 111 which allows a gap at the rear that backs onto Plot 93 and 92 Gardens and 111.



FOG 47 reduces surveillance to Plot 35 rear garden gate and also parking for Plot 35 has no surveillance to its parking location.



- Allotments:** The DAS noted that this area would be secured with chain link fencing and hedging. It is recommended that if chain link fencing is to be used then the hedging planted should be prickly and defensive hedging (hawthorn is an example). Hedging **used should be mature so that it already provides a good level of protection.**
RECOMMENDATION: Ideally 1.8 m welded mesh fencing, as it is more sustainable and is anti-climb and vandal proof. Gates should be lockable and the same height and material as the fencing. The allotments should be managed and display good signage with Point of Contact name and number displayed in case of an emergency. An allotment watch committee should be formed. The dwellings facing the area should be asked to report any suspicious activity. Sheds should be locked and tools should be property marked with owner’s postcode and house number and preferably removed at night to reduce the opportunity of being used to commit further crime or stolen. Allotment holders are advised to review Suffolk Police Website for First Principles Allotment Security guidance.

- Recessed door ways:** Some of the designs don’t provide good visibility to the neighbouring dwellings door way which reduces surveillance to them.
RECOMMENDATIONS: Front doors should be flush and in line with the building in order to provide good natural surveillance to the front door.



- Apartments:** **RECOMMENDATIONS:** These will need access control and consideration for compartmentalisation to ensure that only residents can access their areas and that non-residents cannot access the building at all. This reduces the risk of burglary, cold calling and mis-use of drugs activity or rough sleeping in communal hallways.

External mail facilities are required so that there is no need for postal access to individual flats and installation of smart meters for easy meter readings. See SBDH 2019 Section 24 in relation to lightweight framed walls, Section 25 for lighting in communal areas within flats/apartments, Section 27 provides full guidance on access control specifications, Section 32 provides guidance on mail delivery options. The balcony areas should not lead themselves to act as climbing aides onto each other (see Section 15 SBDH 2019). Haverhill experiences issues with parkour runners so it is essential that flat roof designs, low level walls or projecting brickwork designs do not provide the opportunity for this type of activity.



- **Fencing:** The Boundary Treatment drawing shows that fencing will be either 1.8 m close board or 1.8 m high brick wall.

RECOMMENDATION: Rear car parking areas that have garden fencing should be installed with 1.5 m close board with 300mm trellis topping to reduce the opportunity to climb over easily and offer more surveillance into the area.

There are areas that have narrow rear access paths; fencing in these areas should also be 1.5 m close board with 300mm trellis topping. See SBDH 2019 Section 10 for full guidance. Defensive planting should also be positioned around walled areas.

Below are some examples of those areas:



General Recommendations

Below are Suffolk Police's general recommendations as detailed in Secured by Design Homes 2019: (see link for guidance book)

https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019_update_May.pdf

- **Layout of Roads and footpaths:**
See Section 8 of SBDH 2019 which encourages defensible space to ensure that the physical environment enables the resident to control the areas around their own home. **Research shows that the benefit of cul-de-sacs can be compromised if they are backing onto open land, or are very long (deep) or linked to one another by footpaths and poor lit. It is important to ensure that permeability is limited as this could provide the opportunity for crime to occur.**
- **Dwelling Layout and Orientation and Boundaries:**
See SBD H 2019 Section 10 and 11 and 13. Section 12 also gives guidance around gable end walls that do not provide further surveillance with windows in active rooms and can lend themselves to the opportunity for graffiti, loitering or ball games. It is important to ensure that gable end windows are designed in active rooms to provide further natural surveillance to vulnerable areas or vehicle parking places between dwellings where garages are not provided.
- **Vehicle Parking:**
See SBDH 2019 Section 16: Vehicles should be either parked in locked garages or on a hard standing within the dwelling boundary.

- **Landscaping:**
See SBDH 2019 Section 17: Sustainable provisions should be made for the maintenance and management of Communal Open Space areas/grass verges/surface water drainage area. The correct use of certain species of plants can impact on the potential for crime and assist with preventing some types of crime. Planting should not impede the opportunity for natural surveillance or blocking of street lighting.
- **Street Lighting:**
See SBDH 2019 Section 18: Lighting should conform to BS 5489-1:2016. Whilst we are sensitive to the need for dark skies we would also point out that poorly lit areas can enable the opportunity for criminal activity and can increase the fear of crime.
- **Security Specifications:** It is recommended that residential dwellings doors and windows are built to Section 21 and 22 (Secured by Design – police approved specification SBD PAS 24:2016). External dwelling lighting should conform to Section 25 of SBDH 2019.
- **Cycle storage and external storage:** Cycle Storage within dwellings should comply with Section 56 of SBDH 2019. The Communal cycle and refuse storage area should comply with Section 56.3, 56.4, 57.2 and 57.3 of SBD H 2019. Access control by residents only and refuse collectors to the facility is paramount as this area could lend itself to Anti-social Behaviour or arson.
- **Communal areas and Play Space:** Should conform to SBD Homes 2019 Section 9.
- **Integral Garages:** Integral garage door sets allowing direct access into the home should be in line with SBDH 2019 Section 21.3.

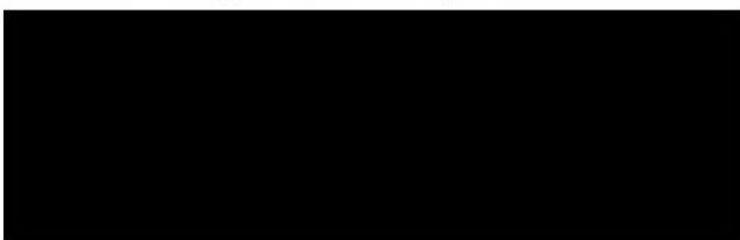
CONSTRUCTION PHASE SECURITY:

Whilst construction is under way Secured by Design provides the following guidance and awareness: Construction Phase Security Advice:

It is unfortunate that there are many crimes which occur during the construction phase of a development; the most significant include theft of plant equipment, materials, tools and diesel fuel. SBD Homes 2019 6 recommends that Security should be in place prior and during the construction phase of your development. This should contain a robust perimeter fencing of the site and a monitored alarm system (by a company/individual that will provide a response) for site cabins and material and fuel storage areas. It is also advised that the contractors name with emergency contact number is displayed in several places on the perimeter fence, allowing the public to report suspicious circumstances. Consideration of mobile/part time CCTV systems or security guards can act as deterrent to criminal activity. It is also recommended that contractors are advised to ensure that their work equipment/tools are property marked, insured and secured appropriately when also off site. See SBD Homes 2019 section 6 for full guidance.

I would be pleased to work with the agent and/or the developer to ensure the proposed development incorporates the required security elements.

This is the most efficient way to proceed with residential developments and is a partnership approach to reduce the opportunity for crime and the fear of crime to make residential and commercial areas safe for those living and working there.



Jackie Norton
Designing Out Crime Officer, Eastern Area
Suffolk Police